

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

In re: Brandon M. Chasen

Case No. 25-15437
Chapter 7

**DEBTOR'S MOTION TO EXTEND TIME TO FILE SCHEDULES, STATEMENT
OF FINANCIAL AFFAIRS, AND RELATED DOCUMENTS**

Debtor Brandon M. Chasen ("Debtor"), by undersigned counsel, respectfully moves, pursuant to 11 U.S.C. § 521, Fed. R. Bankr. P. 1007(c), 1019, and 9006(b)(1), for an order extending the deadline to file his Schedules, Statement of Financial Affairs ("SOFA"), and related documents (collectively, the "Required Filings"). In support, Debtor states as follows:

I. INTRODUCTION AND REQUESTED RELIEF

1. That this Court has jurisdiction under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b)(2)(A). Venue is proper under 28 U.S.C. §§ 1408–09.
2. That this case commenced as an involuntary petition under 11 U.S.C. § 303 on June 16, 2025. A summons was issued requiring a response within 21 days. Counsel for the Debtor entered an appearance on June 29, 2025. On July 11, 2025, the Debtor filed a motion to convert the case to a voluntary case. The Court granted the motion on July 30, 2025. Pursuant to Fed. R. Bankr. P. 1007(c), the current deadline to file the Required Filings is August 13, 2025.
3. That this case is a large, complex Chapter 7 case with a Debtor who has numerous affiliated entities, voluminous financial accounts, and substantial creditor constituencies. Some source records necessary to complete accurate Schedules and the SOFA are temporarily unavailable despite diligent efforts to obtain them.

II. APPLICABLE LAW

4. That Rule 1007 requires debtors to file schedules, statements, and other

documents within specified time limits, and authorizes the Court to extend those limits “for cause.”

5. That Rule 9006(b)(1) authorizes enlargement of deadlines for “cause” if sought before expiration of the period.

6. That in converted cases,; extensions remain available “for cause” by motion.

III. GROUNDS FOR EXTENSION

7. That the Debtor’s financial affairs are unusually complex. Debtor was the principal of multiple business ventures and real-estate holdings, with numerous accounts, and contingent/unknown claims requiring careful reconciliation. Completing accurate schedules and a fulsome SOFA requires compiling and cross-checking data from multiple banks, brokerages, and third-party custodians.

8. That despite diligent efforts, certain source records (including K-1s, remain outstanding... These are necessary to ensure complete and accurate disclosures. Debtor’s long-standing accountant is working to access workpapers and account-level details needed to finalize various schedules and SOFA items.

9. That the Debtor has been in contact with the Chapter 7 Trustee, Zvi Guttman, since shortly after the case’s conversion, has promptly responded to requests, and has already provided some core records to facilitate—not delay—the trustee’s review.

10. That a short, defined extension will (i) enable accurate, internally consistent disclosures; (ii) avoid unnecessary amendments and motion practice; and (iii) assist the Trustee and creditors with reliable information. No party will be prejudiced by a brief extension, and the Trustee’s ongoing review will continue unabated.

11. That this motion is filed before the current deadline, and thus falls within Rule 9006(b)(1)’s “for cause” standard.

IV. REQUESTED RELIEF

Debtor respectfully requests entry of an order:

- a. Extending the deadline to file all Required Filings through August 27, 2025;

- b. Authorizing Debtor to file any supplemental or amended schedules thereafter as permitted by the Code and Rules; and
- c. Granting such other and further relief as is just.

Respectfully submitted,

THE LAW OFFICES OF ADAM M. FREIMAN, P.C.

By: /s/ Adam M. Freiman

Adam M. Freiman (CPF # 9306230121)

115 McHenry Ave., Suite B4

Pikesville, MD 21208

T: 410-486-3500

E: adam@pikesvillelaw.com

Counsel for Debtor

Date: August 14, 2025

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2025, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Motion to Extend Time will be served electronically by the Court's CM/ECF system upon the Chapter 7 Trustee, Zvi Guttman, upon the US Trustee and upon the following:

Ferguson Enterprises

Peoplesbank

Sandy Spring Bank

Southland Insulators of Maryland, Inc.

Steven C. Tourkin

United Bank

/s/ Adam M. Freiman

Adam M. Freiman 23047 CPF#:9306230121